

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

UNITED STATES OF AMERICA

PLAINTIFF

V.

4:20-CR-00288-DPM

RENEA GODDARD

DEFENDANT

MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS

Comes now the Defendant, Renea Goddard, by and through her attorney, Dominique King, and for his Motion to Modify Pretrial Release Conditions, states as follows:

1. Ms. Goddard was indicted on February 3, 2020 (ECF No. 56) and was arraigned on February 25, 2021.
2. On December 17, 2020, Ms. Goddard was released on conditions.
3. Since that time, Ms. Goddard has been in preparation to relocate to Chicago. Ms. Goddard desires to relocate to Chicago because it is in her best interest for her career, a fresh start, and she would like to distance herself from the stigma and job limitations due to her involvement in this case.
4. It is counsel's understanding from the U.S. Pretrial Services Officer assigned to Ms. Goddard that Ms. Goddard has discussed this move with her, and there is no objection.
5. Ms. Goddard requests a modification allowing her to relocate to Chicago and receive supervision services there. She is employed and has found and secured stable housing.

6. Ms. Goddard has no criminal convictions or track record of doing wrong or missing court.

7. Undersigned Counsel has spoken to counsel for the United States, and there is no objection to this request.

WHEREFORE, the Defendant, Renea Goddard, respectfully requests that this Court grant her Motion, and for all other just and appropriate relief.

Respectfully submitted,

RENEA GODDARD

By: Dominique King ABN 2015178
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